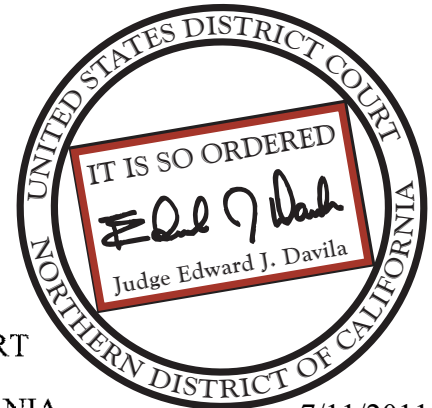


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Attorneys for Plaintiff
 PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG



UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

7/11/2011

PROBUILDERS SPECIALTY INSURANCE
 COMPANY, RRG, a District of Columbia, Risk)
 Retention Group,

Plaintiff,

v.

VALLEY CORP. B., a California Corporation)
 formerly known as R.J. HAAS CORP.; RONALD)
 J. HAAS, an individual; TY LEVINE, an
 individual; and KAREN LEVINE, an individual,

Defendants.

CASE NO.:5:10-cv-05533-EJD

**STIPULATION TO FILE SECOND
 AMENDED COMPLAINT AND
 [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff PROBUILDERS
 SPECIALTY INSURANCE COMPANY, RRG, ("Plaintiff") and Defendants TY LEVINE, KAREN
 LEVINE, and RONALD J. HAAS, (collectively "Defendants")¹ through their respective counsel,
 hereby stipulate to the filing of a Second Amended Complaint, pursuant to Federal Rule of Civil
 Procedure 15(a)(2).

WHEREAS Plaintiff filed its First Amended Complaint on December 17, 2010;

WHEREAS Plaintiff has become aware of information concerning additional insureds under
 the ProBuilders Policy, and would like to clarify prior allegations;

¹VALLEY CORP. B. has not appeared in this action. According to the California Secretary
 of State's website, VALLEY CORP. B. is a suspended corporation.

1 WHEREAS Plaintiff has determined that the First Amended Complaint should therefore be
2 amended;

3 WHEREAS Defendants have reviewed Plaintiff's Second Amended Complaint and consented
4 to Plaintiff filing its Second Amended Complaint, attached hereto as Exhibit A.

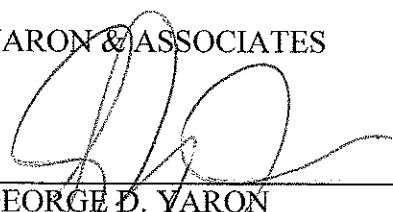
5 THEREFORE, pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff and Defendants
6 Stipulate to Plaintiff filing its Second Amended Complaint. The Second Amended Complaint shall
7 be deemed filed as of the date of this Order.

8 **IT IS SO STIPULATED.**

9 DATED: July 8, 2011

YARON & ASSOCIATES

11 By:

12 
13 GEORGE D. YARON
14 JAMES I. SILVERSTEIN
15 HIELAM CHAN
16 Attorneys for Plaintiff
17 PROBUILDERS SPECIALTY INSURANCE
18 COMPANY, RRG

15 DATED: July __, 2011

HINES SMITH CARDER DINCEL

17 By:

18 KIM O. DINCEL
19 JULIE ROGERS
20 Attorneys for Defendants
21 TY LEVINE AND KAREN LEVINE

20 DATED: July __, 2011

GREENAN, PEFFER, SALLANDER, & LALLY

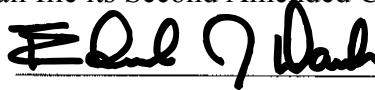
22 By:

23 CHIP COX
24 Attorney for Defendants
25 RONALD J. HAAS

26 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

25 On or before July 12, 2011, the Plaintiff shall file its Second Amended Complaint as a separate
26 docket entry.

26 DATED: July 12, 2011



27 UNITED STATES DISTRICT JUDGE
28 EDWARD J. DAVILA

1 WHEREAS Plaintiff has determined that the First Amended Complaint should therefore be
2 amended;

3 WHEREAS Defendants have reviewed Plaintiff's Second Amended Complaint and consented
4 to Plaintiff filing its Second Amended Complaint, attached hereto as Exhibit A.

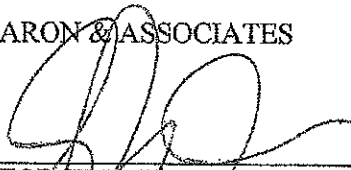
5 THEREFORE, pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff and Defendants
6 Stipulate to Plaintiff filing its Second Amended Complaint. The Second Amended Complaint shall
7 be deemed filed as of the date of this Order.

8 **IT IS SO STIPULATED.**

9 DATED: July 7, 2011

YARON & ASSOCIATES


10
11 By:

12 
13 GEORGE D. YARON
14 JAMES L. SILVERSTEIN
15 HIELAM CHAN
16 Attorneys for Plaintiff
17 PROBUILDERS SPECIALTY INSURANCE
18 COMPANY, RRG

15 DATED: July 7, 2011

HINES SMITH CARDER DINCEL

16
17 By:

18 
19 KIM O. DINCEL
20 JULIE ROGERS
21 Attorneys for Defendants
22 TY LEVINE AND KAREN LEVINE

20 DATED: July __, 2011

GREENAN, PEPPER, SALLANDER, & LALLY

21
22 By:

23 CHIP COX
24 Attorney for Defendants
25 RONALD J. HAAS

26 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

26 DATED: _____

27 UNITED STATES DISTRICT JUDGE
28 EDWARD J. DAVILA

1 WHEREAS Plaintiff has determined that the First Amended Complaint should therefore be
2 amended;

3 WHEREAS Defendants have reviewed Plaintiff's Second Amended Complaint and consented
4 to Plaintiff filing its Second Amended Complaint, attached hereto as Exhibit A.

5 THEREFORE, pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiff and Defendants
6 stipulate to Plaintiff filing its Second Amended Complaint. The Second Amended Complaint shall
7 be deemed filed as of the date of this Order.

8 **IT IS SO STIPULATED.**

9 DATED: July 8, 2011

YARON & ASSOCIATES

11 By: 

12 GEORGE D. YARON
13 JAMES L. SILVERSTEIN
14 HIELAM CHAN
Attorneys for Plaintiff
PROBUILDERS SPECIALTY INSURANCE
COMPANY, RRG

15 DATED: July __, 2011

HINES SMITH CARDER DINCEL

17 By: _____

18 KIM O. DINCEL
19 JULIE ROGERS
Attorneys for Defendants
TY LEVINE AND KAREN LEVINE

20 DATED: July 8, 2011

GREENAN, PEFFER, SALLANDER, & LALLY

22 By: 

23 CHIP COX
Attorney for Defendants
24 RONALD J. HAAS

25 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

26 DATED: _____

27 UNITED STATES DISTRICT JUDGE
28 EDWARD J. DAVILA